

570 Broad Street / Suite 1201 / Newark, NJ 07102 **P:** 973.623.3000 / **F:** 973.623.0858 / litedepalma.com

Newark ■ Chicago ■ Philadelphia

September 14, 2016

Judge Madeline Cox Arleo, U.S.D.J. U.S. District Court for the District of New Jersey Martin Luther King, Jr. Federal Building and Courthouse 50 Walnut Street Newark, New Jersey 07102

Judge Michael A. Hammer, U.S.M.J. U.S. District Court for the District of New Jersey Martin Luther King, Jr. Federal Building and Courthouse 50 Walnut Street Newark, New Jersey 07102

> Re: Alqanawi v. City of Paterson, et al. Civil Action No. 13-1578

Dear Judge Arleo and Judge Hammer:

This office represents the City of Paterson (the "City) in the above captioned matter. I am submitting this letter on behalf of all parties to advise the Court that the City Council passed a resolution last night approving the settlement of this matter. The parties are in the process of finalizing a payment schedule and settlement agreement language with releases. As a result, there is no need to convene a trial and all deadlines associated with same may be cancelled from the Courts' calendars. In addition, the parties consent to the entry of a sixty (60) day order to allow the parties to finalize the terms of the settlement and for the City to obtain approval from State of New Jersey Department of Community Affairs ("DCA"), which must approve all settlements by the City of this amount.

Should Your Honors have any questions or require any additional submissions, please do not hesitate to have chambers contact me.

Respectfully,

/s/ Victor A. Afanador

Victor A. Afanador

VAA:cd

cc: All Counsel of Record (via ECF)
Domenick Stampone, Esq. (via email)
Trishonda Williams (via email)